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10 Attorneys for Plaintiff
11 CRUMP INSURANCE SERVICES, INC.

12 UNITED STATES DISTRICT COURT
13
14 NORTHERN DISTRICT OF CALIFORNIA

15 CRUMP INSURANCE SERVICES, INC.,

16 Plaintiff,

17 v.

18 MICHAEL P. MCGRATH, an individual,
19 ALL RISKS, LTD., a corporation, and
20 Does 1 through 50, inclusive,

21 Defendants.

Case No. C-07-4636 MMC

**DECLARATION OF DYLAN B. CARP IN
SUPPORT OF PLAINTIFF CRUMP
INSURANCE SERVICES, INC.'S
MOTION TO COMPEL (1) ALL RISKS
TO PRODUCE ALL DOCUMENTS
RESPONSIVE TO CRUMP'S REQUESTS
FOR PRODUCTION, SET ONE, NOS. 8-
12; (2) MCGRATH TO PRODUCE ALL
DOCUMENTS RESPONSIVE TO
CRUMP'S REQUESTS FOR
PRODUCTION, SET ONE, NOS. 13-17;
(3) ALL RISKS TO PRODUCE ALL
DOCUMENTS RESPONSIVE TO
CRUMP'S REQUESTS FOR
PRODUCTION, SET TWO, NOS. 36-37;
(4) MCGRATH TO ANSWER
DEPOSITION QUESTIONS
REGARDING HIS COMPENSATION AT
ALL RISKS; (5) MCGRATH AND ALL
RISKS TO PRODUCE ANY
DOCUMENTS WITHHELD ON THE
GROUND OF PRIVACY OR
ATTORNEY-CLIENT PRIVILEGE; AND
(6) MCGRATH, MARTY, AND CORTEZI
TO ANSWER QUESTIONS AT
FURTHER DEPOSITIONS REGARDING
THE DOCUMENTS AND
INFORMATION**

Date: August 6, 2008

Time: 9:30 a.m.

Chief Magistrate Judge James Larson

Courtroom: F

1 I, Dylan B. Carp, declare:

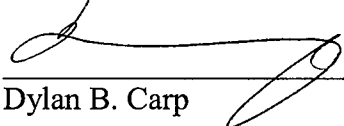
2 1. I am an associate with Jackson Lewis LLP, the attorneys of record for Plaintiff
3 Crump Insurance Services, Inc. ("Crump"). I submit this Declaration in support of Crump's
4 Motion to Compel (1) All Risks to produce all documents responsive to Crump's Requests for
5 Production, Set One, Nos. 8-12; (2) McGrath to produce all documents responsive to Crump's
6 Requests for Production, Set One, Nos. 13-17; (3) All Risks to produce all documents responsive
7 to Crump's Requests for Production, Set Two, Nos. 36-37; (4) McGrath to answer deposition
8 questions regarding his compensation at All Risks; (5) McGrath and All Risks to produce any
9 documents withheld on the ground of privacy or attorney-client privilege; and (6) McGrath,
10 Marty, and Cortezi to answer questions at further depositions regarding the documents and
11 information. I have personal knowledge of the facts set forth below and, if called as a witness,
12 could testify competently to them.

13 2. I have in good faith conferred with the party failing to make discovery in an effort
14 to obtain it without court action.

15 3. Attached as Exhibit A are true and correct excerpts of the transcript of the
16 deposition of Michael P. McGrath taken June 30, 2008.

17 4. Attached as Exhibits B-I are true and correct copies of correspondence between
18 me and Kristen Williams, counsel for Defendants, in attempts to resolve the discovery disputes at
19 issue in this motion.

20 I declare under penalty of perjury under the laws of the United States of America that the
21 foregoing is true and correct. Executed this 24th day of June, 2008 at San Francisco, California.

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23
24 
Dylan B. Carp